

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Dennis Allen Robinson, Jr,
Debtor.

Mellon CRA Mortgage Loan Trust c/o
Everhome Mortgage Company,
Movant,

v.

Dennis Allen Robinson, Jr,
Debtor,

and

William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
05-14658/JKF

CERTIFICATION OF DEFAULT

Danielle Boyle-Ebersole, Esquire, Attorney for Movant, certifies that Debtor has defaulted upon the terms of this Court's Stipulation and Order dated November 17, 2005, a true and correct copy of which is attached hereto and marked Exhibit "A." It is further certified that the attached notice, marked as Exhibit "B," was served upon the Debtor and Debtor's Attorney on August 17, 2010. The Debtor has failed to cure the default as set forth in the Notice. The Debtor has failed to make the following payments:

Taxes for 2006 in the amount of \$1,165.02;
Taxes for 2007 in the amount of \$1,165.02;
Taxes for 2008 in the amount of \$1,251.41; and
Attorney fee of \$50.00 for the Notice of Default
TOTAL DEFAULT \$3,631.45

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

Dated: September 15, 2010

BY: /s/ Danielle Boyle-Ebersole, Esquire
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